For ***claim 5***, Zhu et al discloses a wide range of target proteins (e.g., see page 50, "The Target Proteins and Peptides" section).

For ***claim 6***, Zhu et al discloses c-myc (e.g., see page 78, lines 15-21).

For ***claim 7***, Zhu et al discloses a wide range of targets including neoplastic and virus infected cells (e.g., see page 50, "The Target Proteins and Peptides" section; see also page 52, last paragraph disclosing virus antigens).

For **claim 8**, Zhu et al does not disclose a target having SEQ ID NO: 1, 2 or 5, but Zhu et al does MHC class I molecules expressed on the surface of yeast cells that fall within the scope of Applicants broad claims and, as a result, must have the same binding affinities i.e., ability to bind to SEQ ID NO: 1, 2 or 5. "When the PTO shows a sound basis for believing that the products of the applicant and the prior art are the same, the applicant has the burden of showing that they are not." *In re Spada*, 911 F.2d 705, 709, 15 USPQ2d 1655, 1658 (Fed. Cir. 1990). The Office does not have the facilities to make such a comparison and the burden is on the applicants to establish the difference. See *In re Best,* 562 F.2d 1252, 195 USPQ 430 (CCPA 1977) and *Ex parte Gray*, 10 USPQ 2d 1922 1923 (PTO Bd. Pat. App. & Int.).

16. Claims 1-8 are rejected under 35 U.S.C. 102(e) as being anticipated by Zhu et al (WO 02/055718 A2) (Filing Date is **October 31, 2001**) (Priority Date is **October 31, 2000**).

For ***claim 1***, Zhu et al (see entire document) discloses "a library of expression vectors encoding a library of protein complexes, each vector comprising: a first nucleotide sequence encoding a first polypeptide subunit; and a second nucleotide sequence encoding a second polypeptide subunit; wherein the first and second nucleotide sequences each independently varies within the library of expression vectors" (see Zhu et al, claim 1; see also abstract), which anticipates claim 1. For example, Zhu et al discloses that said first and/or said second polypeptide subunits may be subunits of a multimeric protein including MHC Class I proteins (e.g., see page 21, line 10; see also claim 16; see especially page 49, last paragraph, "the variable sequences V1 and V2 of the library of expression vectors may also be derived from multimeric proteins other than antibodies ... e.g., class I MHC; see also page 50, lines 12-17; see also claims 15-16). In addition, Zhu et al discloses displaying the libraries of MHC class I chimeric proteins on the surface of yeast cells (e.g., see claims 2 and 46-47, "[t]he library of claim 1, where the first or second polypeptide subunit further comprises a yeast agglutinin cell wall protein"). Finally, Zhu et al discloses mutagenizing the MHC proteins with a library of variable regions for increasing the specific binding affinity to a target (e.g., see Field of Invention; see also page 50, lines 12-17; see also page 50, "The Target Proteins and Peptides" section; see also figures).

For ***claims 2-4***, Zhu et al discloses AGA2 (e.g., see claims 46-47).